

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-- against --

**AT&T, INC.,
CHRISTOPHER C. WOMACK,
KENT D. EVANS, and
MICHAEL J. BLACK,**

Defendants.

21 Civ. 1951 (PAE)

ECF Case

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
NOTICE OF MOTION FOR
SUMMARY JUDGMENT AS TO LIABILITY**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion for Summary Judgment as to Liability against Defendants AT&T, Inc., Christopher C. Womack, Kent D. Evans, and Michael J. Black (“Defendants”), the Declaration of Victor Suthammanont and its attached exhibits, the Declaration of Jordan Baker and its attached exhibits, the Plaintiff’s Local Rule 56.1 Statement of Undisputed Material Facts, the Parties’ Amended Joint Statement of Undisputed Facts (DE 84) and its attached exhibits, and all prior proceedings and pleadings in this action, Plaintiff Securities and Exchange Commission (the “Commission”) will respectfully move this Court, at the United States District Court located at 40 Foley Square, Room 2201, New York, NY 10007, before the Honorable Paul A. Engelmayer, at a date and time to be determined by the Court, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment as to liability in favor of the Commission against the Defendants on all claims against them in the Complaint (DE 1), specifically as follows: Defendant AT&T for violating Section 13(a) of the Securities Exchange

Act of 1934 (“Exchange Act”) [15 U.S.C. §78m(a)] and Regulation FD [17 C.F.R. § 243.100] thereunder (First Claim); and Defendants Womack, Evans, and Black for aiding and abetting Defendant AT&T’s violations of Section 13(a) of the Exchange Act and Regulation FD (Second Claim).

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court’s Third Amended Civil Case Management Plan and Scheduling Order dated March 22, 2022, Defendants’ response, if any, shall be filed by May 20, 2022, and the Commission’s reply papers shall be filed by May 31, 2022.

Dated: New York, New York
May 3, 2022

SECURITIES AND EXCHANGE COMMISSION

By: /s/ Victor Suthammanont
Victor Suthammanont
Alexander M. Vasilescu
David Zetlin-Jones
Joy Guo
100 Pearl Street, Suite 20-100
New York, New York 10004
(212) 336-5674 (Suthammanont)
Email: SuthammanontV@sec.gov

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2022, I sent a true and correct copy of Plaintiff's Notice of Motion for Summary Judgment as to Liability, its memorandum of law in support, dated May 3, 2022, the declarations of Victor Suthammanont and Jordan Baker, both dated May 3, 2022, and each with accompanying exhibits, also in support, by email and Accellion electronic transfer to counsel of record:

Jeffrey M. Tillotson
Tillotson Law
1807 Ross Ave., Suite 325
Dallas, TX 75201

Leslie C. Thorne
Haynes and Boone, LLP
30 Rockefeller Plaza, 26th Floor
New York, NY 10112

*Counsel for Defendants Christopher C.
Womack, Kent D. Evans, and Michael J.
Black*

Richard S. Krumholz, Esq.
Norton Rose Fulbright US LLP
2200 Ross Avenue
Dallas, TX 75201

Peter A. Stokes
Norton Rose Fulbright US LLP
98 San Jacinto Boulevard, Suite 1100
Austin, Texas 78701

Seth M. Kruglak
Norton Rose Fulbright US LLP
1301 Avenue of the Americas
New York, New York 10019

Randall Jackson
Brittany Wagonheim
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, New York 10019

Counsel for Defendant AT&T, Inc.

/s/ Victor Suthammanont

Victor Suthammanont